

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

JULY 10 P 4:27

ALONZO AUSTIN  
Plaintiff,

v.

GLOBAL CONNECTION INC.,  
OF AMERICA  
CEO/CFO- SAM Abdallah  
Rachelle Copeland  
and GLOBAL CONNECTION INC.  
OF ALABAMA ET, AL.  
Defendant's,

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Case Number:

3:07-CV-042-MEF.

PLAINTIFF ALONZO AUSTIN'S MOTION FOR LEAVE  
TO FILE MOTION FOR ORDER COMPELLING DISCLOSURE

Comes Now, the Plaintiff ALONZO AUSTIN,  
Pursuant to ~~Federal~~ Rule of Civil Procedure  
37(a) (1) (2) and (3), and respectfully  
Moves this honorable Court for the  
entry of an order granting it Leave  
to file the instant Motion for  
Order Compelling Disclosure Pursuant  
to Rule 26(a) upon the following grounds

1. That the Defendant's GLOBAL CONNECTION INC.  
of AMERICA ET, AL. has failed to make complete  
disclosures Pursuant to Rule 26(a) (B)(1) More  
specifically, Copies of billing Statement, Payment  
Received, Credit Card Transaction, Checks  
Money orders payments, business insurance,

INCOME TAX STATEMENTS FOR THE  
2005 AND 2006 TAX YEAR, ~~AN VOICES~~  
FOR THE MONTHS OF NOVEMBER AND DECEMBER, 2005  
AND DOCUMENT SHOWING DATE AND TIME PHONE  
SERVICE WAS TERMINATED CONTRACTUALLY  
WITH TERMS AND CONDITIONS ATTACHED.

2. That Plaintiff Alonzo Austin, has  
in good faith conferred by certified  
mail with a return receipt see EX-A  
letter attached in an effort to  
secure the disclosures without court  
action. Addressed to the defendant's

Respectfully Submitted,  
by Alonzo Austin, pro se  
Alonzo Austin

CERTIFICATE OF SERVICE

1321 Oliver-Carlis Rd  
Tuskegee, AL 36083  
Ph# (334) 727-5476

I Alonzo Austin hereby  
certify that I have served

Copies of the foregoing document upon the defendant's  
GLOBAL CONNECTION INC. OF AMERICA ET AL.

C/O MCKOON THOMAS, # MCKOON  
925 Broad Street  
P.O. BOX 3220

Phoenix City, AL 36868-3220

BY Placing same in the United States Mail, postage  
prepaid on this 10<sup>th</sup> day of July, 2007, by Alonzo Austin

by, Alonzo Austin, pro se  
Alonzo Austin  
1321 Oliver-Carlis Rd  
Tuskegee, AL 36083  
Ph# (334) 727-5476

EXHIBIT A  
10F1 Via Certified Mail

June 29, 2007  
ALONZO AUSTIN Prose  
1321 Oliver-Carlis Rd.  
Tuskegee, Al. 36083  
(334) 727-5476

GLOBAL CONNECTION INC. OF AMERICA et.al.  
9% MCKOON, THOMAS & MCKOON  
925 broad Street  
P.O. Box 3220  
Phenix CITY, Al. 36868-3220

Re: ALONZO AUSTIN VS. GLOBAL CONNECTION INC.  
Case No. 3:07-cv-42-MEF

Dear: MR. MCKOON,

Pursuant to Rule 37(a) (Motion for  
Order Compelling Disclosure or Discovery)  
this Letter is a good faith attempt  
to Ascertain the initial Disclosures  
Pursuant to Rule 26(a)(1) Promised  
by you Due by the 1<sup>st</sup> day of June 2007.

I mailed my initial Disclosures on  
May 31, 2007 to you Certified Mail.  
With a Return Receipt dated June 8, 2007  
Signed by Amburly Watson. there is also the  
Court order Compelling Exchange by June 18, 2007  
Please Comply within the Next 5 working days. Thanks  
*Alonzo Austin*

~~EXHIBIT A~~Certification

## SENDER: COMPLETE THIS SECTION

## COMPLETE THIS SECTION ON DELIVERY

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the envelope, or on the front if space permits.

## 1. Article Addressed to:

Global Connection Inc.  
c/o McRoon, Thomas/McRoon  
925 Broad Street  
P.O. Box 3220  
Phoenix City, AZ 85068-3220

**X AMBREY WATSON**  Agent  
 Addressee

B. Received by (Printed Name) **AMBREY WATSON** C. Date of Delivery **7-2-07**  
 D. Is delivery address different from item 1?  Yes  
 No  
 If YES, enter delivery address below:

EXHIBIT A

## 3. Service Type

Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

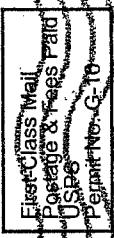
## 4. Restricted Delivery? (Extra Fee)

Yes

2.7 7006 2760 0001 7559 1220

PS Form 3811, February 2004 Domestic Return Receipt

102595-02-M-1540



UNITED STATES POSTAL SERVICE

02 JUL 2007 PM 3 1

• Sender: Please print your name, address, and ZIP+4 in this box •

Alonzo Austin  
1321 Oliver-Carlis Rd,  
Wolfeboro, NH 36083

RECORDED MAIL